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January 10, 2012

Honorable Magistrate Michael Hammer
U.S. District Court
District of New Jersey
Martin Luther King, Jr. Federal Bldg.
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Pizio vs HTMT Global Solutions
Docket No: 2:09-cv-01136-JLL-CC

Dear Judge Hammer:

Please be advised I represent the plaintiff Ernest Pizio in the above referenced matter. This letter is being sent with the consent of defendants' counsel to extend the fact discovery in this matter for 30 days to February 24, 2012. The parties have been diligently moving forward on discovery, including the deposition of several out of state witnesses. There are depositions scheduled currently of witnesses and we most recently conducted the deposition of a witness residing in Florida, Mr. Anand via video conference.

I am aware of the Court's previous Order on Informal Application and Amended Scheduling Order extending the date to January 25, 2012 and indicating that no further extensions would be granted.

However, the parties have been diligent in their efforts to conduct the depositions, including the deposition of a representative of the EEOC which was scheduled prior to the fact deadline date, but has been adjourned by the EEOC representative to a date after the discovery deadline.

I believe that this 30 day additional discovery period will give the parties enough time to complete all the fact discovery in this matter.

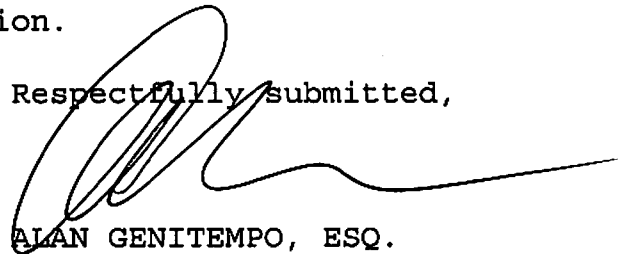
The parties of course would request an additional 30 day extension as to the expert discovery which unfortunately was not addressed by the previous amended scheduling Order.

Just so the Court is aware, the Court has already scheduled an in person settlement conference before Your Honor on February 23, 2012 at 10:00 A.M.

Please advise as to whether the Court would agree to extend the fact discovery deadline and also the expert discovery deadline by 30 days.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alan Genitempo', with a long horizontal flourish extending to the right.

ALAN GENITEMPO, ESQ.

AG/ei

Cc: Paula Lopez, Esq.

Cc: Ernest Pizio